Y2K AND EPA EMERGENCY RESPONSE
- a general impact discussion -

PURPOSE

This white paper was developed by the EPA Region 9 Office of Emergency Response and EPA OERR to contribute to a focused discussion of the potential impact of the Y2k technology problem on the EPA removal program and emergency response capabilities. It was also developed to provide input for on-going contingency planning efforts. It is a living document and will be edited and up-dated from time to time as feedback is received. It is important to note that the contents and references contained in the paper are believed by the authors to be accurate at the time of publication. However, information on Y2k is very fluid and is constantly being revised and updated. Readers are advised to consult the most recently available information from reliable sources in pursuing an education on Y2k.

INTRODUCTION

Y2k, a.k.a the year 2000 technology problem, a.k.a. the millennium bug, a.k.a. overblown, a.k.a. under-estimated, a.k.a. very confusing, a.k.a. very real. What does this technical problem mean to the hazmat response infrastructure and the hazmat response mission? Potentially - a lot; Definitely - something. Y2k is a technical issue that has very real and very broad roots. However, it is also a program and resource management issue because it's potential impact is far reaching and can compromise organizational and physical infrastructure at many levels. Every response organization has the potential for both internal and external Y2k vulnerabilities. If realized, these wide spread vulnerabilities could domino to stress the national response system and mutual aid network.

As a community, we plan and perform consequence management for weather disasters, earthquakes, oil spills, hazmat releases, terrorism events and other scenarios that can cause significant disruption and harm to human health, the environment and social infrastructure. We don't know when these events will occur; we don't know where they will occur; and we don't know their size or impact. But we do know that there is a significant probability that something will occur, sometime, somewhere. So we plan for it. We must also plan for Y2k. The Y2k technology problem has the potential to cause significant disruption and harm to human health, the environment and social infrastructure. However, we know exactly when it will occur (January 1, 2000 and other associated dates); we know exactly where it will occur (everywhere) and although may not currently know the size or impact, we can get a good measure of it by assessing our internal and external vulnerabilities. As a community, responders, response planners, and response managers should all be well briefed on Y2k and prepared to deal with its consequences. The scope of this problem has yet to be completely defined, however significant, manageable effort can still be invested now to help control and minimize Y2k impact. Such efforts are critical in the emergency response community.

This white paper is structured to address Y2k issues in the same way that Y2k projects are organized : awareness, inventory, assessment, remediation, testing, and contingency planning. The awareness section will provide a brief education on the problem and its scope. The inventory & assessment section will provide a discussion on internal and external systems that are Y2k vulnerable and may affect the EPA removal program and its response capabilities. The remaining sections will be devoted to organizational discussions that include proposals for future work.

Our response obligations are fairly clear - we must be credibly educated on Y2k, get our own house in order, communicate with our response partners, and develop well-researched, realistic contingency plans and work around solutions. Time is short.

AWARENESS - i.e. PROBLEM DEFINITION

The Y2k technology problem has many aspects. Problem statements on the technical details, scope, and hazmat mission aspects of the issue are provided below:

problem statement- technical

Basically, the Y2k problem is caused by the representation of the four digit year (1970) as a two digit year (70). Even now dates are commonly represented in shorthand as MMDDYY. This abbreviation standard was developed to save on costly, limited computer memory in the early days of the computing era. It remained a standard for uniformity, simplicity, and just because. If a system element (e.g. microchip, software application) uses the two digit convention for dates and is date sensitive, the computer system will malfunction when it first encounters the date January 1, 2000. The system may recognize 00 as 1900, as an instruction signature, or as nonsensical data. Its malfunction may manifest itself in numerous ways including faulty data reporting and/or complete system failure and shut down. This is, technically speaking, a simple problem to fix. You must either reprogram or replace the vulnerable code or device. Easy? Unfortunately the answer is no. The impact and challenge of Y2k is found in its size, not in its technical detail. The sheer volume of work - inventory, assessment, remediation, testing - is enormous. In addition, the affected chips and software code can be difficult to find; they can be hard to evaluate; the fix must be tested; and time is short. Plus, most folks got a very late start in the game

> **Myth:** Affected systems are exclusively defined as laptop, desktop, server, and mainframe computers and their associated software and hardware.
>
> **Reality:** Affected systems include the embedded chip computers of simple devices that incorporate some sort of microprocessor for decision-making, data recording and/or function. While date sensitivity causes Y2k vulnerability, date does not have to be an obvious element of the microprocessor's function. Date stamping was often done automatically and as good engineering practice, regardless of chip function. In addition, many chips were manufactured generically with date functionality as a given. Y2k vulnerability is a function of chip specific design and application. By percentages

In general, there are two basic types of affected systems :

1. Information Technology (IT) - complex hardware and software computer systems.
2. Embedded Controls - simple microprocessors with "burned in" software code.

Because they are so pervasive and their date sensitivity can be difficult to grasp, it is worth expanding on the definition and Y2k impact of embedded controls a.k.a embedded systems.

According to the Institution of Electrical Engineers website on Embedded Systems and Y2k, "A general purpose definition of embedded systems is that they are devices used to control, monitor or assist the operation of equipment, machinery, or plant. 'Embedded' reflects the fact that they are an integral part of the system . . ."

An excerpt from the September 1998 NERC report to DOE illustrates the potential size of the problem:

"In the electric industry, these chips are used in communications and numerous power system device controllers. Electronic chips are generally mass-produced without knowing the ultimate application of the chip. A single circuit board can have 20–50 of these chips from various manufacturers. Because of the diversity of chip suppliers, one vendor may use a different mix of chips even within devices labeled with the same name, model number, and year. Many of these chips have built in clocks that may experience date change anomalies associated with Y2k. The difficulty is in identifying all of these devices, determining if they have a Y2k problem, and repairing or replacing those that do. It is estimated that less than 1–2% of these devices may use a time/date function in a manner that could result in a Y2k malfunction of the device."
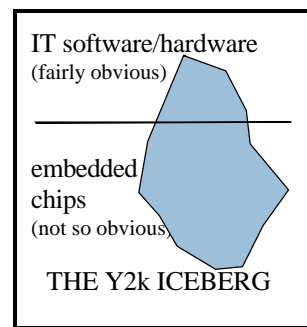
Although a 1- 2% Y2k malfunction rate may seem small, consider that there will be an estimated 25 billion chips at work globally on January 1, 1999. Two percent of 25 billion is 500 million. Other researched estimates of affected chips are based on a projection of 40 billion chips with a 1-10% rate of Y2k sensitivity. Either way, that is a large number of Y2k vulnerable systems that must be found, evaluated, fixed, and tested. If even a fraction of these chips have serious Y2k problems and even a fraction of them are infrastructure critical systems, the resultant problem could be sizeable though not necessarily unmanageable if adequate work is done in advance.

It is important to note that this is not just a January 1, 2000 issue. There are numerous dates that have the potential to affect computerized systems. This is important in planning as well as testing. A critical short list includes the following dates

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    April 1, 1999 - fiscal year start in some countries/states
    April 9, 1999 - Julian calendar instance of 9999, a common instruction code signature
     June 1, 1999 - fiscal year start in some countries/states
  August 21, 1999 - GPS rollover
September 9, 1999 - calendar instance of 9999, a common instruction code signature
   October 1, 1999 - fiscal year start for U.S.
   January 1, 2000 - first instance of 00 as date
February 29, 2000 - non-standard leap year
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problem statement - scope (i.e. affected systems)

Until recently, the primary focus of Y2k remediation activities was software scrubbing and mainframe exorcizing. However, as the adjacent image illustrates, traditional computing and software systems (a.k.a. information technology or IT systems) only represent the tip of the iceberg where Y2k is concerned. Embedded systems represent a huge portion of the Y2k problem and can be present in the controls of everything from drinking water treatment plants, to fuel management systems, to fax machines, to pipeline SCADA systems, to manufacturing robotics, to chemical manufacturing systems, to power plant and power distribution systems, to communication equipment. As described by the Wired News report of the Chemical Safety Board's 12/98Y2k Summit, petroleum and chemical plants are laced with computerized control systems, some of which are vulnerable to Y2K glitches. Offshore oil platforms rely on automated controls to manage pumps, natural gas compressors, wellheads,

IT software/hardware
(fairly obvious)

embedded chips
(not so obvious)

THE Y2k ICEBERG

and air compressors. Every step of the oil delivery process -- production, processing, refining, and storage -- uses similar electronic controls. These embedded controls are numerous, wide spread and many may be affected by Y2k and other associated dates.

A few examples of Y2k sensitive IT and embedded systems is provided below. Attachment 1 provides a list of Y2k vulnerable systems at a generic waste water treatment facility. This list may also provide a good template for a generic chemical/petroleum manufacturing facility.

IT SYSTEMS	EMBEDDED SYSTEMS
FAA air traffic and control systems	Office automation (fax machines and photocopiers)
Rail yard and line switching systems	Laboratory equipment
SCADA systems in gas & petroleum pipelines	Medical devices (including life support systems)
911 system	Building infrastructure including HVAC & security
CAMEO & Aloha	Process control systems
ERNS	Electrical power generation and distribution systems
Laptop/desktop/LAN operating systems	Transportation and navigation systems
Voice messaging system	Communication equipment
Inventory systems	Monitoring equipment

problem statement - mission

The hazmat and emergency response mission will most certainly be impacted by Y2k. The magnitude of that impact has yet to be completely defined. However, multiple or even single system failures could easily affect responders with impacts ranging from simple but pervasive "hassle factor" problems to significant safety, personnel and response problems. Even if there were no year 2000 technology problems, the social and community planning issues associated with the millennium change could impact the response community. Because EPA's response program provides support and back-up for local and state response capabilities, their Y2k problems may become ours. The fact that some urban police and fire departments are beginning to cancel leave for staff during the weeks before and after 01/01/2000 certainly illustrates the degree to which they expect their resources to be tapped. Indeed, it is possible that the whole of the mutual aid network may be challenged and stressed. This solid network may serve well when it is confronted with a handful of problems at the same time. But what if it is confronted with many significant response needs in many geographically disparate areas at the same time? What if it is confronted with these problems beginning in 1999 and well into the year 2000? Using worst case forecasting, the implications for the EPA emergency response program could include:

- Inability to communicate due to localized power, equipment, or telcom failures
- Response equipment failures
- Limited ability to travel due to transportation problems
- Increased reliance on EPA response support because local response capabilities are tapped
- Numerous infrastructure problems
- Equipment, personnel, and budget shortfalls
- Increased incidence in hazardous materials releases due to production facility Y2k problems
- Increased incidence in hazardous materials releases due to transportation Y2k problems
- Increased number of superfund/OPA clean-ups due to Y2k bankrupted facilities

While there is no degree of certainty that any one of these listed problems will occur, the potential is well-documented and is significant enough to warrant further investigation, evaluation, and planning. It is also important to note that there could be significant regional differences in Y2k vulnerabilities due to external factors like local infrastructure preparedness.

INVENTORY & ASSESSMENT - i.e. MISSION VULNERABILITY

What are the Y2k affected systems that can cause a problem for the EPA Removal Program and its response authorities, abilities, and obligations? In the construction of a laundry list of these vulnerable systems a pattern emerges illustrating that the systems generally fall into two categories: internal vulnerabilities and external vulnerabilities.

internal vulnerabilities

Internal vulnerabilities are those systems that are within the EPA removal program's span of control that may have Y2k problems. A partial list of potential internal vulnerabilities of the EPA removal program at a regional level include:

- response equipment (vehicles, monitoring & analytical equipment)
- communication equipment (fax, pagers, cell phones & service)
- field information technology equipment (laptops, gps)
- office IT equipment (LAN & associated desktops)
- physical infrastructure (building systems - including security & HVAC)
- personnel & funding availability - both EPA & Contract
- site engineered response systems (waste extraction, treatment, or monitoring)

IT systems and physical infrastructure systems are being addressed within each Region with HQ support. These activities have been underway for a while, so a good understanding of issues and the status of repairs should be easily acquired at a regional level. Each Region's Y2k coordinators should have the most updated information regarding these issues. However, regional Emergency Response Offices should confirm Y2k activities in their Region, both internally and externally. At present, the Y2k assessment of field equipment - including laptops, communication and general response equipment - is the responsibility of each Emergency Response Office. Regional organization may dictate otherwise, but until such support is confirmed, it should not be assumed.

external vulnerabilities

External vulnerabilities are defined as systems or organizations that may impact the hazmat response mission and /or infrastructure as a result of Y2k failures beyond the immediate control of the EPA removal program. These vulnerabilities are certainly more difficult to catalog and understand, much less address. However, a few broad category groupings can be identified for the purposes of this discussion. One must note in reviewing this list that failure or any dimension of impact on these systems is not a certainty. These are simply infrastructure areas that have been identified by a variety of analysts as being Y2k vulnerable. At a minimum, consideration should be given to each of these systems in contingency planning efforts. One should recognize that a great deal of private and public effort and talent has been and is being devoted to fixing Y2k problems in these systems. However, the problems are numerous and widespread and not all may be identified and/or fixed in time.

POWER — Potential for power disruptions and outages
TRANSPORTATION — Potential for transportation delays and/or disruption
COMMUNICATION — Potential for communication systems and equipment failures
SUPPLY CHAIN — Potential for delays in materials supply and distribution
WATER — Potential for disruption of drinking water supply
WASTEWATER — Potential for sewage treatment and processing failures
HAZMAT — Potential for hazardous material management/release problems
MEDICAL — Potential for medical equipment and device failures

Y2k impact on most of the sectors listed above may not have a direct impact on hazardous materials response but may present response obstacles in the form of infrastructure failures and response resource diversion. Hazardous materials releases as an external vulnerability could result from chemical and petroleum manufacturing, storage, and transportation failures as a result of embedded control, software failures, or external factors such as power failures.

REMEDIATION, TESTING & CONTINGENCY PLANNING - i.e. FUTURE WORK

The amount of potential work that could be outlined in this section is large. One must identify issues broadly but prioritize and select the few that can produce results as quickly and as comprehensively as possible. The EPA Emergency Response Program should approach Y2k issues and readiness at many levels. All mission critical systems must be identified and evaluated. Such system evaluation should not be limited to information technology and equipment support, it should include response systems, networks, and protocols. Many aspects of the program may be affected from planning to field. A list of possible Y2k preparation activities for regional and national consideration is provided below as a template for further discussion and action. This list is followed by a very brief and by no means exhaustive discussion of activities that are currently underway in EPA's Emergency Response Programs.

NATIONAL LEVEL	REGIONAL LEVEL
Staff and Management Education on Y2k	Staff and Management Education on Y2k
Dedicated Y2k Planning and Outreach Staff	Identification of Y2k ER coordinator
Coordination of Task Force on Y2k Response Issues	Participation in Task Force on Y2k Response Issues
Development of Continency Plan Outline	Development of Regional Y2k Continency Plan
Development of Outreach & Educational Materials	Incorporate Y2k into ACP & RCP
Development of Equipment Checklist	Equipment Inventory & Assessment
Funding for Y2k Equipment Needs	Identification of Y2k equipment needs
Contracts Language and Support	START and ERCS outreach and coordination
Outreach to USCG & NRT	Outreach to Strike Team and other response partners
Coordination with EPA Y2k workgroup	Outreach to RRT, LEPC
Development of Y2k Work Plan	Communication with regional Y2k coordinator
Development of Inspection Inquiry Language	Incorporation of Y2k inquiry into inspections
Centralized Information Clearing House	Identify key Y2k personnel at State and Local levels
Outreach to Industry	Outreach to Industry

Numerous Y2k project activities are currently underway in the Emergency Response Program. These activities include but are not limited to:

- Monthly Conference Calls to discuss Y2k Project Status - HQ coordination
- Response equipment evaluation - Regional Coordination

The OERR monthly conference calls include the participation of regional emergency response representatives from the ten EPA Regions, as well as the Environmental Response Team. This group will monitor progress in the six steps outlined below to assure that EPA's domestic emergency response program is ready to maintain its responsibilities under the National Response System given the Y2k situation. Other stakeholders are also participating in these calls including the Technology Innovation Office, the Chemical Preparedness and Prevention Office, and the Office of Radiation and Indoor Air.

As additional efforts are undertaken, it is important that they be well organized and well documented. Successful Y2k programs will include the following steps:

One: Take Inventory

Designate a Y2k team leader. Make a list of equipment that may have Y2k problems. Consider computer systems, software programs, fax machines, monitoring equipment and other pieces of equipment that use embedded chips. Also consider support systems, such as building and security systems. As a parallel path, make an inventory of external Y2k vulnerabilities that includes contract, response, and communication networks. Such a list will serve as input in outreach and contingency planning efforts.

Two: Assess and Prioritize

List what you've done to prepare for Y2k. Identify equipment and systems critical to your operation. Make it a priority to fix or replace them, if appropriate.

Three: Evaluate and Test Your Systems

Evaluate and test your systems for Y2k problems. You should get educated on testing procedures before you begin. First, contact the equipment/software manufacturer directly. A tremendous amount of Y2k compliance status information is available on the web. However, while they provide a good degree of assurance you should not rely entirely on verbal or written assurances of compliance. You should also test your equipment directly, if possible. But be careful. Entering a Year 2000 date could shut it down. Follow the instructions of a reputable testing program or have an experienced tester perform this task.

Four: Correct Problems

Check out computer software or equipment upgrades to fix your Y2k problems. Contact software publishers. Ask what fixes or remedies they provide. After installing available Y2k fixes, retest your systems to verify that the fixes corrected the problem. Some equipment may need to be replaced. Don't forget to test your fixes as well.

Five: Make Contingency Plans

Develop contingency plans to address external and internal vulnerabilities, including a plan if you or your response partners have problems. Significant effort should be placed here and serious consideration should be given to exercises, communication strategies and resource needs, deployment, and pre-positioning. Can you get your troops & contractors out the door? Will they have the people, information, and equipment needed to work safely?

Six: Be Alert to Recontamination

Once you've completed your tests and fixed any Y2k problems, be careful not to recon-taminate your systems by installing new programs or exchanging data with non-compliant systems. New equipment purchases and contracts should incorporate Y2k consideration.

Questions, Comments or Suggestions?

Several individuals within EPA's emergency response program may be contacted to discuss this paper. This version of the paper is dated 2/03/99. The originator and principal author is OSC Kay Lawrence of EPA Region IX. Kay may be reached at (415) 744 - 2289. The Senior Process Manager for Emergency Response within OERR is Mark Mjoness and the primary staff person at OERR is Regional Coordinator Dan Thornton. Mark and Dan may be contacted at (703) 603 - 8727 and (703) 603 - 8811, respectively.

ATTACHMENT 1

POSSIBLE LOCATIONS OF EMBEDDED CHIPS IN
DRINKING WATER AND WASTEWATER TREATMENT FACILITIES

Communications Infrastructure
- Auto dialers
- Network bridge and routers
- Portable radio communication equipment
- Uninterruptible power supplies
- Wireless transmitters and receivers
- Voice/Data telecommunications equipment, including cell phones and pagers
- Uninterruptible Power Supplies

Instrumentation and Ancillary
- Automatic calibration systems
- Automatic sampling equipment
- Chemical analyzers
- Chemical feeders
- Hand held calibration equipment
- Lab and quality control instruments
- Maintenance diagnostic instruments
- Liquid flow meters (batch/totalizing)

Facilities and Support
- Battery chargers
- Building Heating, Venting, and Air Conditioning (HVAC) systems
- Building security systems
- Eyewash systems
- Fire and smoke alarm systems
- Programmable machining equipment
- Guard control systems
- Weather monitoring systems
- Uninterruptible Power Supplies
- Geographic Positioning System (GPS)
- Diagnostic Engine Analyzers
- Automated Fueling Systems

Materials Tracking
- Automated warehousing systems
- Bar code readers and printers
- Product/materials labeling and printing
- Wireless data terminals

Production and Process
- Automated reconditioning/ regeneration systems
- Distributed control systems
- Local controllers (programmable)
- Operator interface hardware
- Power monitoring equipment
- Programmable logic controllers (PLCs)
- Weight scales
- Demand management controls
- Hand held programming terminals and equipment
- Message displays
- Operator interface software
- Programmable chart recorders
- Data loggers
- Proprietary communications interfaces
- Supervisory Control and Data Acquisition System (SCADA) hardware and software
- Meter reading equipment
- Remote terminal units

Process Controls
- Flow meters
- Pump motor controllers
- Level controllers
- Flow controllers
- Chemical feeders
- Mixer speed controllers
- Aeration blower controllers
- Chlorinators